

Millennium 2000, Inc.

2019 W. 95th Street
Chicago, Illinois 60643
Phone 1-866-961-1901
Fax 1-866-961-2881

Via Electronic Filing

February 25, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: EB Docket 06-36, Annual Customer Proprietary Network Information Certification

Dear Ms. Dortch:

Enclosed for filing please find the CPNI Compliance Certificate and accompanying Statement of Millennium 2000, Inc. These documents collectively comprise Millennium 2000's Annual CPNI certification pursuant to Section 64.2009(e) of the Commission's rules.

Sincerely,



Donna M. Harrison
President

cc: Best Copy and Printing, Inc. (via e-mail FCC@BCPIWEB.COM)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

1. Date filed: February 25, 2011
2. Name of company(s) covered by this certification: Millennium 2000, Inc.
3. Form 499 Filer ID: 827466
4. Name of signatory: Donna Harrison
5. Title of signatory: President
6. Certification:

I, Donna Harrison, certify that I am an officer of the company named above, and acting as an agent of Millennium 2000, Inc., that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

Millennium 2000 has **not taken** actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

Millennium 2000 has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

Donna M. Harrison

Attachments: Accompanying Statement explaining CPNI procedures

cc: Best Copy and Printing, Inc.

Millennium 2000, Inc.
Statement of CPNI Procedures

To ensure compliance with the Federal Communication Commission (FCC) Customer Proprietary Network Information (CPNI) rules, Millennium 2000, Inc. has adopted a policy to ensure the protection of CPNI. This statement describes our procedures and provides practical guidance on how to protect against unauthorized disclosure and/or use of CPNI.

Duty to Protect CPNI

Millennium 2000's employees, independent contractors and joint venture partners that may deal with CPNI will be informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, personnel must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

In order to provide access to CPNI, all employees, independent contractors and joint venture partners will be required to enter into a confidentiality agreement to ensure compliance with CPNI rules. Resources will be required to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided prior to disclosing CPNI information.

Millennium 2000 will not market, share or otherwise sell CPNI information to any third party. CPNI will not be shared without proper authorization, a justifiable reason and is being done in accordance with existing rules required by law. It is the company's practice to establish an annual review process regarding carrier compliance with the rules and how to improve such operating procedures.

Customer Notification of CPNI Rights

Prior to any outbound marketing campaign, Millennium 2000 will provide a CPNI privacy policy to its customers. This policy will provide notification to each customer of his/her right to restrict use of, disclosure of, and access to that customer's CPNI and the various circumstances under which Millennium 2000 may wish to use, disclose, or permit access to CPNI, pursuant to the Commission's rules. Millennium 2000 will maintain records for one year, of its CPNI customer notifications and its customer opt-in and opt-out approvals to use, disclose, or permit access to CPNI.

CPNI Compliance Officer

Millennium 2000 has designated a CPNI Compliance Officer who is responsible for:

1. Communicating with the company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions;
2. Supervising the training of company staff that use or have access to CPNI;
3. Supervising the use, disclosure, distribution or access to the company's CPNI by independent contractors and joint venture partners;
4. Maintaining records regarding the use of CPNI in marketing campaigns; and
5. Receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Procedures for Disclosing Detailed Call Records to Customers

Millennium 2000 shall prohibit its staff from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:

1. The customer has a password established on their account.
2. The information requested by the customer is to be mailed to the customer's address of record for at least 30 days.
3. Millennium 2000 calls the customer's telephone number of record for at least 30 days and discusses the information with the party initially identified by customer when service was initiated.

Training on CPNI

CPNI protection measures include privacy training for all staff (including independent contractors) regarding company privacy policies and procedures. All staff members will be trained as to when they are and are not authorized to use CPNI. When a customer calls to inquire about their own account, the caller's identity is verified. Accurate records are being kept at all times and any changes to any CPNI will only be effected upon receipt of the customer's authorization.

Sales and Marketing Campaigns

Millennium 2000 will maintain an electronic record of their sales and marketing campaigns that use CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, the date and purpose of the campaign, and what products or services were offered as part of the campaign. Millennium 2000 will retain the record for a minimum of one year.

Disciplinary Guideline

We have implemented the following disciplinary guidelines for staff who fail to follow Millennium 2000 CPNI policies:

1. Millennium 2000 will inform its staff that it considers compliance with the Communications Act and FCC rules regarding the use, disclosure, and access to CPNI of the utmost importance.
2. Violation by the company's staff of such CPNI requirements will lead to disciplinary action.
3. Disciplinary action will be determined based upon the severity of the violation, whether appropriate guidance was sought and the extent to which the violation was deliberate or malicious.
4. Disciplinary action may include one or more of the following: Written and/or verbal reprimands, unfavorable performance reviews, probation and/or termination

Disciplinary records will be maintained in the company files in accordance with our record-keeping policies.

CPNI Breach Reporting

Millennium 2000 will report CPNI breaches to law enforcement no later than seven (7) business days after determining the breach has occurred, by sending electronic notification through the link at <http://www.fcc.gov/eb/CPNI/> to the central reporting facility, which will then notify the United States Secret Service and the Federal Bureau of Investigation. Millennium 2000 will notify customers of the breach seven (7) business days after we have notified law enforcement through the central reporting facility, unless law enforcement requests a further delay. Records relating to such notifications will be kept for two (2) years. These records will include: (a). the date we discovered the breach; (b).the date we notified law enforcement; (c). a detailed description of the CPNI breached; and (d). the circumstances of the breach.